

21 March 2018

Risk assessment and safety standards

I am writing to you, and all other holders of mainline safety certificates and authorisations, to remind you of your obligations in relation to risk assessment and the identification of applicable safety requirements.

This follows recent ORR discussions with DfT and several duty holders where long-since discontinued HSE or ORR publications have been mistakenly identified as being currently applicable standards, specifically in relation to fire safety.

A key requirement of any certified or authorised safety management systems is that it contains procedures to meet relevant technical and operational standards. It goes without saying that meeting relevant standards requires, at the very least, the capability correctly to identify them on a continuing basis.

Furthermore, since 2013, all technical, operational or organisational changes – including the introduction of new infrastructure or vehicles - on the mainline railway are subject to the EU common safety method on risk evaluation and assessment (CSM RA). Competent application of the CSM RA should ensure the correct standards and requirements are identified by those designing, developing and introducing new projects on the railway. In the case of both the safety management system and risk assessment, it is clear that the responsibility for identifying relevant safety requirements rests with the organisation undertaking the activity (for example, the train operator or infrastructure manager in question) and not with the regulator.

While ORR can accept no responsibility when duty holders identify an out of date or incorrect standard, we are happy to again remind the industry that the HMRI Railway Safety Principles and Guidance Parts 1 and 2 (otherwise known as “RSPG” or “the Blue Book”) were discontinued in 2005. We updated and reintroduced much of the content of RSPG Part 1 in 2017 as our new “Principles for railway health and safety”, and we consider that this document provides clear, non-prescriptive and high-level explanation of what is required. The RSPG Part 2 documents are no longer considered to represent good practice and have long been overtaken by Technical Specifications for Interoperability,

RSSB-managed standards, and EN / BSI standards. As a result ORR has long since withdrawn those documents and has no plans to reintroduce them. In the case of fire safety precautions, current Government guidance on Fire Safety in Transport Premises (<https://www.gov.uk/government/publications/fire-safety-risk-assessment-transport-premises-and-facilities>) continues to apply.

I am copying this letter to Brian Etheridge (Director, Network Services) and Simon Smith (Director, Passenger Services) at DfT, and to Bill Reeve at Transport Scotland. It will also be published on ORR's website.

Yours sincerely



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HM Chief Inspector of Railways

